It is not in the public interest to convert ag land to a large housing development at this time. Such decisions should be denied or at least postponed until economic recovery from COVID. The Environmental Impact Statement (EIS) is inadequate, using outdated and incorrect data, and needs correction before using it to make a decision. In addition, the infrastructure, particularly traffic abatement and waste treatment in Kapaa are insufficient for this project. This project has been mislabeled as "affordable housing", and "sustainable" while there is insufficient water supply and infrastructure to meet the Hokua Place projected population. Kauai is unsustainable with food supply, already has sewage overflows into the ocean, insufficient teachers and space with covid restrictions, and our coral reefs beyond recovery. The sewage and traffic conditions will be further exacerbated by the pre-approved increased hotel development in Kapaa. The EIS assessment of both sewage and traffic concerns are unrealistic and inadequate.

The Wailua Wastewater Treatment Plant and Transfer Station have been fined multiple times by the State for overflows and spill violations and evidently not capable of additional capacity. It is old and in need of major repair before this additional project should even be considered. The sewer design standards used by the county Dept of Public Works were based on 1973 and 2008 references. Further limitations include moving the Wailua Waste Water Plant inland at some point due to Wailua River flooding and rising sea levels.

Fresh water access to this area is also limited and the proposed source of Grove Farms Waiahi Surface Water Treatment Plant is problematic. This facilities ability to provide water in the future is questionable, with the absence of a NPDS wastewater permit in the State of Hawai'i since 2016. That plant is already at or near capacity and there is ongoing litigation over the un-permitted taking of water from streams supplying the Waiahi Plant. The developers failed to provide well water and a water permit has not been issued to Hokua Place by the Dept. of Water.

Many houses (hundreds) are already approved or being built which do not require agricultural lands, or expansion of infrastructure, some of which are affordable housing projects. In the long run, this project will not add anywhere near enough property taxes to pay for the additional infrastructure and negatively affects Kauai's main source of income from tourism with already unacceptable traffic delays in Kapaa. We need to be en route to more sustainable conditions on Kauai before adding extensive housing development.

I respectfully request that you do not change the designation of lands from agricultural to urban.

Thank you for your consideration.

L. Osterer, long term Kauai resident